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June 15, 2016

BY HAND AND ECF

Hon. Marilyn D. Go, U.S.M.J.
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Weiss, et al. v. National Westminster Bank Plc, 05-cv-4622 (DLI)(MDG)
Applebaum, et al. v. National Westminster Bank Plc, 07-cv-916 (DLI)(MDG)
Strauss, et al. v. Crédit Lyonnais, S.A., 06-cv-702 (DLI)(MDG)
Wolf, et al. v. Crédit Lyonnais, S.A., 07-cv-914 (DLI)(MDG)

Dear Magistrate Judge Go:

I am writing on behalf of the parties in all four of the above-referenced cases in accordance with Your Honor's Scheduling Order dated June 1, 2016. The parties have conferred and agreed to a proposed schedule for their submission of pre-motion letters to Chief Judge Irizarry, in which the parties will request a pre-motion conference with respect to their contemplated motions, as follows:


- Plaintiffs will file their pre-motion letter to Chief Judge Irizarry with respect to their proposed motion for an order consolidating their claims against Defendants National Westminster Bank Plc ("NatWest") and Crédit Lyonnais, S.A. ("Crédit Lyonnais") for a single liability trial on June 22, 2016. NatWest and Crédit Lyonnais will file their responses no later than on June 29, 2016.
- Crédit Lyonnais will file its pre-motion letter to Chief Judge Irizarry with respect to (a) its renewal of its previously-filed motion for partial reconsideration of the Court's February 28, 2013 Opinion and Order denying Crédit Lyonnais's initial summary judgment motion, and (b) its motion for summary judgment with respect

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to the five terrorist attacks not previously briefed as part of Crédit Lyonnais's initial summary judgment motion, on June 22, 2016. Plaintiffs will file their response no later than on June 29, 2016.

- NatWest will file its pre-motion letter to Chief Judge Irizarry with respect to (a) its motion for summary judgment with respect to the two terrorist attacks added to Plaintiffs' proposed Amended Complaints, and (b) its renewal of its previously-filed motion for summary judgment on the grounds that the Court did not address in the Court's March 28, 2013 Opinion and Order, and pursuant to the October 21, 2014 remand order by the Court of Appeals, on June 22, 2016. Plaintiffs will file their response no later than June 29, 2016.

Respectfully,



Lawrence B. Friedman

cc: All Counsel